

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SCRAMOGE TECHNOLOGY LTD.,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

Case No. 6:21-cv-01138-ADA

JURY TRIAL DEMANDED

MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiff Scramoge Technology Ltd. and Defendant Google LLC (collectively, the “Parties”) agree that there will be confidential information exchanged in this case. Accordingly, the Parties respectfully request that the Court enter the agreed proposed Protective Order, attached hereto as Exhibit A.

Dated: May 3, 2022

Respectfully submitted,

By: /s/ Brett Cooper

Brett E. Cooper (NY SBN 4011011)

bcooper@raklaw.com

Reza Mirzaie (CA SBN 246953)

rmirzaie@raklaw.com

Marc A. Fenster (CA SBN 181067)

mfenster@raklaw.com

Seth Hasenour (TX SBN 24059910)

shasenour@raklaw.com

Drew B. Hollander (NY SBN 5378096)

dhollander@raklaw.com

RUSS AUGUST & KABAT

12424 Wilshire Blvd., 12th Floor

Los Angeles, California 90025
Telephone: (310) 826-7474
Facsimile: (310) 826-6991

Counsel for Plaintiff Scramoge Technology Ltd.

By: /s/ Bijal V. Vakil
J. Mark Mann
State Bar No. 12926150
mark@themannfirm.com
G. Blake Thompson
State Bar No. 24042033
blake@themannfirm.com
MANN | TINDEL | THOMPSON
201 E. Howard St.
Henderson, Texas 75654
(903) 657-8540
(903) 657-6003 (fax)

Bijal V. Vakil (CA Bar No. 192878)
(admitted to the Western District of Texas)
ALLEN & OVERY LLP
530 Lytton Ave 2nd Floor
Palo Alto, CA 94301
Telephone: (650) 388-1650
Email: googlescramoge@allenoverly.com

Shamita Etienne-Cummings (CA Bar No. 202090)
(admitted to the Western District of Texas)
ALLEN & OVERY LLP
1101 New York Avenue, NW
Washington, DC 20005
Telephone: (202) 683-3800
Email: googlescramoge@allenoverly.com

Counsel for Defendant Google LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that this document is being served through CM/ECF on May 3, 2022.

/s/ Drew Hollander
Drew B. Hollander